

MILBERG LLP

ALASTAIR J.M. FINDEIS (255941)

afindeis@milberg.com

777 Woodward Avenue, Suite 890

Detroit, MI 48226

Telephone: (313) 309-1760

Facsimile: (313) 447-2536

Counsel for Plaintiff

MICHAEL WILSON

MORGAN, LEWIS & BOCKIUS LLP

BARBARA A. FITZGERALD (151038)

bfitzgerald@morganlewis.com

KATHRYN T. McGUIGAN (232112)

kmcguigan@morganlewis.com

300 South Grand Avenue, Suite 2200

Los Angeles, CA 90071

Telephone: (213) 612-2500

Facsimile: (213) 612-2501

Counsel for Defendant

BRISTOL-MYERS SQUIBB, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MICHAEL WILSON,

Plaintiff,

v.

BRISTOL-MYERS SQUIBB, INC.,

Defendant.

CASE NO. 2:06-cv-06065-DDP-CTx

**JOINT STIPULATION TO EXTEND
MEDIATION CUT-OFF DATE**

**Second Amended Complaint Filed:
March 11, 2009**

1 Plaintiff Michael Wilson ("Plaintiff") and Defendant Bristol-Myers Squibb
2 ("Defendant") (collectively, the "parties"), by and through their respective counsel
3 of record, hereby stipulate and agree as follows:

4 1. WHEREAS, on March 24, 2014, this Court ordered the parties to
5 mediate through the Court-Directed ADR Program;

6 2. WHEREAS, on April 21, 2014, a Panel Mediator was assigned by the
7 ADR Program staff to this matter and the parties were ordered to complete
8 mediation no later than June 19, 2014; and

9 3. WHEREAS, because the parties have not completed sufficient
10 discovery in this action as to allow the parties to engage in a meaningful mediation,
11 before the previously imposed mediation completion date of June 19, 2014, the
12 parties agree to extend the Mediation Cut-Off date one hundred and twenty (120)
13 days from June 19, 2014 to October 17, 2014, which the parties believe will permit
14 a meaningful and productive mediation;

15 NOW, THEREFORE,

16 IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES,
17 through their undersigned counsel, that the Mediation Cut-Off date be extended
18 from June 19, 2014 to October 17, 2014.

19 Dated: June 10, 2014

MILBERG LLP

21 By: /s/ Alastair J.M. Findeis
22 ALASTAIR J.M. FINDEIS
23 Attorneys for Plaintiff
Michael Wilson

24
25 Dated: June 10, 2014

MORGAN, LEWIS & BOCKIUS LLP

26 By: /s/ Kathryn T. McGuigan
27 KATHRYN T. MCGUIGAN
28 Attorneys for Defendant
Bristol-Myers Squibb, Inc.